CERTIFICATE OF COMPLIANCE

Nos. 19-1434, 19-1452, 19-1458

UNITED STATES OF AMERICA,

– v. –

ARTHREX, INC., et al.,

Respondents.

SMITH & NEPHEW, INC., et al.,

– v. –

Petitioners,

ARTHREX, INC., et al.,

Respondents.

Petitioner,

– v. –

SMITH & NEPHEW, INC., et al.,

ARTHREX, INC.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief Amicus Curiae contains 5,013 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

s/Nikolina Gurfinkel Nikolina Gurfinkel

Sworn to on this 30th day of December, 2020

Petitioner,